

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
EL PASO DIVISION**

LEAGUE OF UNITED LATIN
AMERICAN CITIZENS, et al.,

Plaintiffs

V.

STATE OF TEXAS, GREG ABBOTT,
GOVERNOR OF THE
STATE OF TEXAS, in his official capacity,
and JOHN SCOTT,
SECRETARY OF STATE OF TEXAS, in his
official capacity

Defendants

Civil Action

Case No. 21-cv-259-DCG-JES-JVB

PLAINTIFF MALC'S RESPONSE TO MOTION TO CONSOLIDATE

Plaintiff Mexican American Legislative Caucus (“MALC”) filed suit in the Western District of Texas, Austin Division challenging redistricting plans for the Texas House of Representatives, the Texas delegation to the United States House of Representatives, and the Texas State Board of Education. *See MALC v. Abbott, et al.*, Case No. 1:21-CV-00988-RP-JES-JVB.

MALC believes the case should be consolidated with whichever case is determined to be the Lead Case, but takes no position as to which earlier filed case is the appropriate Lead Case. MALC also joins the *Brooks* Plaintiffs in urging expeditious resolution of the issue of consolidation. Given the exigent nature of approaching election deadlines and the likelihood of requests for preliminary injunctive relief from multiple parties, an expedited resolution of the consolidation will certainly contribute to greater judicial economy and greater clarity for the upcoming election season.

Dated: November 17, 2021.

Respectfully submitted,

SOMMERMAN, MCCAFFITY,
QUESADA & GEISLER, L.L.P.

/s/ Sean J. McCaffity

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ATTORNEYS FOR PLAINTIFFS

CERTIFICATE OF SERVICE

The undersigned certifies that the foregoing Response to Motion to Consolidate was filed and served via CM/ECF electronic service on November 17, 2021 to all counsel of record.

/s/ Sean J. McCaffity
